

REMARKS/ARGUMENTS

Favorable reconsideration of this application is respectfully requested in light of the following discussion.

Claims 11-13, 15-17, and 19-21 are pending in the present application.

In the outstanding Office Action, Claims 11-13, 15-17, and 19-21 were rejected under 35 U.S.C. 103(a) as unpatentable over U.S. Patent No. 6,487,392 to Sonetaka in view of U.S. Patent No. 6,314,163 to Acampora. That rejection is respectfully traversed.

Though they are different in scope, each of the independent claims recites a common transmission format enabling compatibility between radio links and optical fiber links; and a distribution unit providing changeable interconnections between signal conversion units and transceiver units for converted signals having the common transmission format.

With this provision, base stations can be freely switched, regardless of whether connections to those stations are provided via radio links or optical fiber links. Applicants' Figure 1 illustrates a non-limiting example of how such free-switching may be provided. More particularly, as described by Applicants' specification at page 16, lines 6-15, Figure 1 illustrates delivery equipment 62 configured to provide free switching amongst base stations.

Sonetaka's central station corresponds to the conventional central control stations illustrated by Figure 10 of the present application. In such conventional central control stations, changeable interconnections between signal conversion units and transceiver units are not provided. Sonetaka does not teach, and does not indicate a desirability of, such changeable interconnections arranged between signal conversion units and transceiver units in a central station; nor such changeable interconnections providing free switching between radio links and optical fiber links in a central control station.

Acampora merely teaches an ATM switch that provides 5x5 packet switching in a base station apparatus. As shown in Acampora's Figure 3a, the ATM switch is situated in a

base station apparatus between antennas and optical transmitters on one side and antennas and optical transmitters on the other side. There is no teaching or suggestion of providing changeable interconnections between signal conversion units and transceiver units in a central control station.

According, neither Sonetaka nor Acampora teaches or suggests providing changeable interconnections between signal conversion units and transceiver units so as to provide free switching between the radio links and optical fiber links in a central control station.

The outstanding Office Action asserts that one skilled in the art would have been motivated to employ the ATM switch taught by Acampora in the central station of Sonetaka. As described above, however, Acampora teaches only an ATM switch used in a base station. There is no apparent motivation to employ such an ATM switch; nor to place such an ATM switch between signal conversion units and transceiver units in a central control station as to provide free switching between the radio links and optical fiber links.

In view of at least this deficiency, the Office Action fails to establish a *prima facie* case of obviousness, because the applied references do not provide some suggestion or motivation for the proposed modification; and because the applied references do not teach or suggest all the claim limitations.¹

Accordingly, for the above-stated reasons, Applicants respectfully request that the rejection of Claims 11-13, 15-17, and 19-21 under 35 U.S.C. 103(a) as unpatentable over Sonetaka in view Acampora be withdrawn.

¹ MPEP § 2143.

Consequently, in light of the above discussion, the present application is believed to be in condition for allowance, and an early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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